

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
UNITED STATES OF AMERICA

- v. -

AHMED MOHAMMED EL GAMMAL,
a/k/a "Jammie Gammal,"

Defendant.

**3500 MATERIAL
STIPULATED
PROTECTIVE ORDER**

15 Cr. 588 (ER)

-----x
EDGARDO RAMOS, District Judge:

WHEREAS the United States of America, by Preet Bharara, United States Attorney for the Southern District of New York, Andrew J. DeFilippis, Brendan F. Quigley and Negar Tekeci, Assistant United States Attorneys, of counsel, will be producing certain materials pursuant 18 U.S.C. § 3500 ("§ 3500") to the defendant, Ahmed Mohammed El Gammal, a/k/a "Jammie Gammal," and his counsel, Sabrina Shroff, Esq., Annalisa Miron, Esq., and Daniel Habib, Esq., including certain materials that, if disseminated to third parties, could, among other things, implicate the safety of others and impede ongoing investigations (the "Protected Materials");

WHEREAS, the Government desires to protect the safety of others and ongoing investigations disclosed in the Protected Materials; and

WHEREAS, in the interest of expediting the process of receiving § 3500 materials, AHMED MOHAMMED EL GAMMAL, the defendant, by his attorneys, Sabrina Shroff, Esq., Annalisa Miron, Esq., and Daniel Habib, Esq. consents to the entry of this Order; NOW, THEREFORE, IT IS HEREBY ORDERED:

1. The Protected Materials shall be used by the defendant, his counsel, and his counsel's agents only for purposes of defending the charges, in connection with sentencing,

and pursuing any appeals, in this criminal action. To the extent the Protected Materials are shown to additional persons consistent with the terms set forth below, those additional persons may use the Protected Materials only in connection with this criminal action.

2. The Government will mark all items subject to this protective order in a manner indicating their protected status.

3. The Protected Materials and the information and identities contained or disclosed therein:

(a) Shall be used by the defendants or his counsel only for purposes of this action;

(b) Shall not be disclosed in any form by the defendant or his counsel except as set forth in paragraph 3(c) below;

(c) May be disclosed only by the defendant's counsel and only to the following persons (hereinafter "Designated Persons"):

(i) investigative, secretarial, clerical, paralegal and student personnel employed full-time or part-time by the defendant's attorneys;

(ii) independent expert witnesses, investigators or advisors retained by the defendant in connection with this action; and


(iii) such other persons as hereafter may be authorized by the Court upon such motion by the defendant; and

(d) Shall be returned to the Government following the conclusion of this case.

4. The defendant and his counsel shall provide a copy of this Order to Designated Persons to whom the Protected Materials are disclosed pursuant to paragraph 3(c)(i), (ii) and (iii). Designated Persons shall be subject to the terms of this Order.

5. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in this action or to any judge or magistrate of this Court in connection with the above-captioned matter.

AGREED AND CONSENTED TO:



 Sabrina Shroff, Esq.
 Annalisa Miron, Esq.
 Daniel Habib, Esq.
 Attorneys for AHMED MOHAMMED EL GAMMAL,
 a/k/a "Jammie Gammal,"

11-24-16

Date

SO ORDERED:

HONORABLE EDGARDO RAMOS
UNITED STATES DISTRICT JUDGE

Date _____